



March 3, 2008  
*Via ECFS Transmission*

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Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW – Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36**  
**CPNI Certification for Telovations, Inc.**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 29, 2008, and pursuant to 47 C.F.R. § 64.2009(e), Telovations, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2007 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3006 or croesel@tminc.com if you have any questions about this filing.

Sincerely,

Carey Roesel  
Consultant to Telovations, Inc.

*CR/gs*  
*Enclosure*

cc: Enforcement Bureau (*provided via ECFS website*)  
Best Copy and Printing (*FCC@BCPIWEB.COM*)  
tms: FCCx0801  
File: Telovations – FCC Certs/Orders

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: 2007

Name of company covered by this certification: Telovations, Inc.

Form 499 Filer ID: 825999

Name of signatory: Doug Knight

Title of signatory: VP Product Management

I, Doug Knight, certify and state that:

1. I am the Vice President of Product Management of Telovations, Inc., and, acting as an agent of the company, I have personal knowledge of Telovations' operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Telovations' operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U and that the company qualifies as a small business entity under the Regulatory Flexibility Act or Small Business Act.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules and the steps it is taking to come into compliance with the Commission's online carrier authentication requirements by the end of the additional 6 month implementation period provided for carriers satisfying the definition of a small business entity.



\_\_\_\_\_  
Doug Knight, VP Product Management

2/29/08

\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

## Statement of CPNI Procedures and Compliance

### **USE OF CPNI**

Telovations, Inc. (“Telovations”) does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Telovations has trained its personnel not to use CPNI for marketing purposes. Should Telovations elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

### **PROTECTION OF CPNI**

Telovations has put into place processes to safeguard its customers’ CPNI/call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Employees are educated that CPNI should not be shared with anyone unauthorized without customer written approval

Although it has never occurred, Telovations will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

Telovations has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Telovations’ authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. An authorized person is identified at the time of the set up. This person is usually the billing contact and the only person who has authority to discuss call detail. All customers are required to establish a password without the use of readily available biographical information or account information if they want to receive call detail over the telephone. If the appropriate password is not provided, Telovations does not disclose call detail over the telephone.

Telovations has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. Company’s back-up authentication procedure operates as follows: Customer must be able to provide BTN (not DID), Account Number and Sales Rep. We will also call the customer back on their BTN before providing a password reset.

Company has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. Customer service will notify the authorized account owner by email, live call and a voice mail left on the BTN.

## **DISCLOSURE OF CPNI ONLINE**

Although Telovations is not yet subject to the on-line requirements, it has instituted authentication procedures to safeguard the disclosure of CPNI on-line. Telovations' authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. An authorized billing contact is identified at the time of the set up. This person is sent an email and prompted to set up an account and password in order to access their on-line billing records. All customers are required to establish a password without the use of readily available biographical information or account information if they want to have on-line access to their CPNI. Unless the appropriate password is provided, Telovations does not allow on-line access to CPNI.

Telovations has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. Company's back-up authentication procedure operates as follows: Customer must be able to provide BTN (not DID), Account Number and Sales Rep. We will also call the customer back on their BTN before providing a password reset.

## **DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

Telovations does not have any retail locations and therefore does not disclose CPNI in-store.

## **NOTIFICATION TO LAW ENFORCEMENT**

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

Although it has never occurred, Telovations will maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

## **ACTIONS AGAINST DATA BROKERS**

Company has not taken any actions against data brokers in the last year.

## **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

## **INFORMATION ABOUT PRETEXTERS**

Telovations has an internal portal that educates our employees on CPNI and how pretexters will attempt to gain knowledge on our customers.